

U.S. DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

Case Name & No.: ALONZO GRANT, et al. v. CITY OF SYRACUSE, et al.  
5:15-cv-00445

Date of Trial: October 2, 2018

PRESIDING JUDGE: Hon. David N. Hurd

( ) Plaintiffs (X) Defendants

Exhibit Number	Marked for Identification	Admitted in Evidence	Remarks	Witness	Exhibit Description
D-1					Crime Map of the area of Hudson Street and Tallman Street in Syracuse, New York
D-2					Photographs taken by the City of Syracuse Police Department on 06/28/2014 (DR-14-344710)
D-3					Photographs taken by the City of Syracuse Police Department of 105

					Hudson Street on 07/25/2018
D-4					Certified 911 CAD Reports for DR-14-344710 (Event Search, Event Chronology, and Unit Information)
D-5					Certified 911 Audio file, "14344710 105 Hudson St (A) 1929 Hrs Phone Call"
D-6					Certified 911 Audio file, "14344710 105 Hudson St (B) 1937 Hrs Phone Call"
D-7					Certified 911 Audio file, "14344710 105 Hudson St (C) 0015 Hrs Phone Call"
D-8					Certified 911 Audio file, "14344710 105 Hudson St (D) SPD Ch 4 Radio 1931-0015 Hrs"

D-9 (Designated Portions)					Transcript of N.Y. G.M.L. § 50-h hearing of Alonzo Grant, pursuant to Deposition Designations, dated 10/21/2014
D-10 (Designated Portions)					Transcript of Deposition of Alonzo Grant, pursuant to Deposition Designations, dated 01/08/2016
D-11					Plaintiffs' Notice of Claim
D-12 (IMPEACHMENT ONLY)					Plaintiffs' Amended Complaint
D-13 (IMPEACHMENT ONLY)					Plaintiffs Alonzo Grant and Stephanie Grant's Response to Defendants City of Syracuse, Syracuse

					Police Department, and Chief of Police Frank Fowler's First Set of Interrogatories
D-14 (IMPEACHMENT ONLY)					Plaintiff Alonzo Grant's Response to Defendants Damon Lockett, Paul Montalto, and Brian Novitsky's First Set of Interrogatories
D-15					Video disclosed to Defendants, taken by Sherell Grant on 06/28/2014, labelled "VID_20140628_19 3515860"
D-16					"LETTER BRIEF MEMORANDUM RE: TIMELINE by Alonzo Grant, Stephanie Grant." (Dkt. No. 98)
D-17					St. Joseph's Hospital Health Center, Employee Warning Notice, 05/06/1996 (Certified Record)

D-18					St. Joseph's Hospital Health Center, Employee Warning Notice, 12/20/1991 (Certified Record)
D-19 (Designated Portions)					Transcript of N.Y. G.M.L. § 50-h hearing of Stephanie Grant, pursuant to Deposition Designations, dated 10/21/2014
D-20 (Designated Portions)					Transcript of Deposition of Stephanie Grant, pursuant to Deposition Designations, dated 01/08/2016
D-21 (IMPEACHMENT ONLY)					Stephanie Grant's Response to Defendants Damon Lockett, Paul Montalto, and Brian Novitsky's First Set of Interrogatories

D-22 (IMPEACHMENT ONLY)					Affidavit of Sherrell Grant
D-23 (IMPEACHMENT ONLY)					Onondaga County Court Clerk Certified Convictions of Corey McMullin, dated 05/19/2009
D-24 (IMPEACHMENT ONLY)					Affidavit of Shakeal Sturup
D-25					SPD Reports produced by Damon Lockett, DR-14- 344710
D-26					SPD Reports produced by Paul Montalto, DR-14- 344710
D-27					Syracuse Police Department Use of Force Report, pursuant to DR-14- 344710

D-28					Booking Video, Onondaga County Correction Facility (06/28/2014), DR-14-344710
D-29					County Booking / Transport Sheet for A. Grant, 06/28/2014 (DR-14-344710)
D-30					SPD Use of Force Policy, from SPD Rules and Regulations
D-31					SPD Domestic Violence Policy, from SPD Rules and Regulations
D-32					SPD 2009 Police Officers In-Service Training
D-33					Basic Police Officer Training Curriculum (Use of Force)

D-34					SPD "Arresting, Processing & Transporting Prisoners" Policy, from SPD Rules and Regulations
D-35					SPD "Disciplinary System" Policy, from SPD Rules and Regulations
D-36					SPD "Professional Standards of Conduct & Ethics" Policy (from manual)
D-37					SPD 2006 Training Curriculum (Police Academy)
D-38					SPD Field Training Officer Guide
D-39					New York State Enforcement Accreditation Program Evaluation 2012

D-40					NY Department of Criminal Justice Services training materials re: use of force defensive tactics/techniques
D-41					Office of Professional Standards ("OOPS") Report from Alonzo Grant incident on 06/28/2014 (OOPS Report No. 14-93)
D-42					Expert Report of Dr. Robert Knapp, dated 01/17/2017
D-43					Expert Report of Guy Rossi, dated 12/29/2016
D-44 (Demonstrative Only)					Annotated photographs and diagrams attached to Rossi Report

1. Defendants reserve the right to supplement this Exhibit list with additional exhibits as needed and depending on the evidence offered by Plaintiff at trial.

2. This exhibit list does not include impeachment exhibits.
3. This exhibit list does not include potential rebuttal exhibits.

Dated: September 17, 2018  
Syracuse, New York

Respectfully submitted,

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CORPORATION COUNSEL  
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By:

/s

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**CERTIFICATE OF SERVICE**

I, John G. Powers Esq., an attorney for Defendants do hereby certify that on September 18, 2018 I caused to be electronically filed the foregoing Defendants' Witness List with the Clerk of the District Court using the CM/ECF system, which is understood to have sent notification of such filing electronically to the following:

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Dated: September 18, 2018

s/John G. Powers  
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